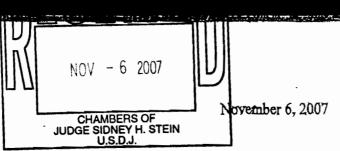
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Send via facsimile 212-805-7924 and Regular Muil

The Honorable Sidney H. Stein United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re:

Clark v. Bean Dredging

07-CIV-8174 (SHS)

Dear Judge Stein:

As you are aware, this office represents the plaintiff in the above-captioned matter. Since no attorneys in our firm are admitted to practice in the United Stated District Court for Southern District of New York, our firm has retained Michael H. Zhu, Esquire as our local counsel.

On October 24, 2007, Mr. Zhu forwarded a letter (Document 5) requesting an adjournment of the Rule 16 Conference, which was scheduled for October 26, 2007, to enable him to prepare the necessary application papers so that I may be admitted pro hoc vice to represent the plaintiff in this matter. In response, the Court ordered that I may appear at the Rule 16 Conference, and that an application for admission pro hoc vice should be submitted within two weeks (Document 5).

However, I must respectfully request an extension of time to file a Motion for Admission Pro Hoc Vice. I have advised Barish • Rosenthal that I will be leaving the firm effective December 3, 2007. Samuel J. Rosenthal, Esquire of the firm will seek admission pro hoc vice, but he has yet to obtain a Certificate of Good Standing from the Pennsylvania Supreme Court. Our firm has been advised that it would take approximately four weeks to obtain said certificate. Thus, I would respectfully request an extension to November 30, 2007 to file a Motion for Admission Pro Hoc Vice.

Thank you for your courtesies in this regard.

Rudelph V. DeGeorge, II

SO ORDERED ////

RDG/lmw

cc: Michael B. McCauley, Esquire (via facsimile and Regular Mari)

Michael H. Zhu, Esquire (via Facsimile and Regular Mail)

SIDNEY H. STEI

U.S.D.J.